

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

ORION HEALTHCORP, INC.,<sup>1</sup>

Case No. 18-71748 (AST)

Debtors.

(Jointly Administered)

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HOWARD M. EHRENBURG IN HIS CAPACITY AS  
LIQUIDATING TRUSTEE OF ORION HEALTHCORP,  
INC., ET AL.,

Plaintiff,

Adv. Pro. No. 20-08048 (AST)

v.

ELIZABETH KELLY; FIDELITY NATIONAL TITLE  
INSURANCE COMPANY,

Defendants.  
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**STIPULATION FOR EXTENSION OF DEFENDANT  
ELIZABETH KELLY'S TIME TO ANSWER THE COMPLAINT**

Plaintiff and Defendant Elizabeth Kelly ("Defendant"), each by and through their respective undersigned attorney, hereby stipulate and agree to extend the time for Defendant to file an answer or otherwise move with respect to Plaintiff's complaint as provided for herein:

1. On March 13, 2020, Plaintiff filed a complaint [Dkt. No. 1] against Defendants Elizabeth Kelly and Fidelity National Title Insurance Company.

2. The Summons [Dkt. No. 2] was issued by the Clerk's Office on March 13, 2020.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.

3. Defendant does hereby acknowledge and accepted service of the summons and complaint. Defendant does not challenge personal jurisdiction and waives any objection to service of process in this adversary proceeding.

4. Defendant does not waive any other defenses, objections or challenges which she may bring in this action other than as expressly stated in the previous paragraph.

**WHEREFORE**, the parties agree that the time by which Defendant is required to answer or move with regard to the Complaint is hereby extended through and including June 30, 2020.

Dated: May 9, 2020

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Ehrenberg in his capacity as Liquidating  
Trustee of Orion Healthcorp, Inc., et al

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